## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

KIMBRA CRISWELL,	
Plaintiff,	
v. )	C.A. No. 05-CV-00321 GMS
( ( LYDIA ADAIR MCFADDEN and CHRISTIANA	) 
CARE HEALTH SERVICES, INC.,	JURY TRIAL DEMANDED
Defendants.	

## STIPULATION TO EXTEND TIME FOR **SUBMISSION OF PRETRIAL ORDER**

It is stipulated by and between the attorneys for the parties in the above captioned case, subject to the approval of the Court, that:

- 1. Pursuant to discussion with Court Chambers today, and directive from Chambers, the parties hereby jointly stipulate and request an extension of time to file the Pretrial Order from March 12, 2007 to March 30, 2007.
- 2. The grounds for this request for an extension of time are as follows: mediation in this case is scheduled for March 30, 2007; Defendants' Motion for Summary Judgment is pending before the Court, briefing having been completed January 3, 2007; the parties are in the process of completing discovery; the deposition of Plaintiff's expert will take place on March 29, 2007.
- 3. This extension will enable the parties to complete discovery so that the Final Pretrial Order will not have to be amended. It will also enable the parties to participate in mediation and meaningful settlement discussions.

4. The parties hereby jointly request that the Court permit submission of the Final Pretrial Order on March 30, 2007.

## RICHARD R. WIER, JR., P.A.

## WHITE and WILLIAMS LLP

2007

/s/ Richard R. Wier, Jr. Richard R. Wier, Jr. (#716) Two Mill Road, Suite 200 Wilmington, DE 19806 (302) 888-3222

SO ORDERED this

/s/ Deborah J. Massaro John D. Balaguer (#2537) Deborah J. Massaro (#4280) 824 North Market Street, Suite 902 Wilmington, DE 19899 (302)467-4501 Attorneys for Defendants, Lydia Adair McFadden and Christiana Care Health Services. Inc.

Of Counsel: Michael T. van der Veen, Esq. Nelson Levin, Esq. KATS, JAMISON, VAN DER VEEN & ASSOCIATES 25 Bustleton Pike Featerville, PA 19053 (215)396-9001 Attorneys for Plaintiff

SO ORDERED this	day of	2007.	
	The Hon	orable Gregory M. Slee	
	Judge, D	ristrict Court for The of Delaware	